

# **Eldene Pre-School & Toddlers**



## **1:Q Data Protection Policy**

### **Policy Statement**

The Pre-School needs to collect and use certain types of information about people with whom it deals in order to operate.

These include current, past and prospective employees, children, parents and other with whom it communicates. In addition, it may occasionally be required by law to collect and use certain types of information to comply with the requirements of government departments for education. This personal information must be dealt with properly however it is collected recorded and used – whether on paper, in a computer, or recorded on other material – and there are safeguards to ensure this in the Data Protection Act 1998. We regard the lawful and correct treatment of personal information by Eldene Pre-School & Toddlers as very important to successful operations, and to maintaining confidence between those with whom we deal and ourselves. We ensure that our organisation treats personal information lawfully and correctly.

To this end we fully endorse and adhere to the Principles of Data Protection. Eldene Pre-School & Toddlers will undertake its role to keep the premises, information and persons physically secure in accordance with identified risk assessments, insurance requirements and legal obligations.

### **Objectives**

Information:

- shall be processed fairly and lawfully and, in particular,
- shall not be processed unless specific conditions are met;
- shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes;
- shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed;
- shall be accurate and, where necessary, kept up-to-date;
- shall not be kept for longer than is necessary for that purpose or those purposes;
- shall be processed in accordance with the rights of data subjects under the Act;
- appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data;

- shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

Therefore, Eldene Pre-school & Toddlers will, through appropriate management, strict application of criteria and controls:

- Observe fully conditions regarding the fair collection and use of information. Meet its legal obligations to specify the purposes for which the information is used.
- Collect and process appropriate information and only to the extent that it is needed to fulfil operational needs or to comply with any legal requirements. Ensure the quality of information used.
- Apply strict checks to determine the length of time information is held, can be fully exercised under the Act. (These include: the right to be informed that processing is being undertaken, the right of access to one's personal information, the right to prevent processing in certain circumstances and the right to correct, rectify, block or erase information which is regarded as wrong information).
- Take appropriate technical and organisational security measures to safeguard personal information.
- Ensure that personal information is not transferred abroad without suitable safeguards.
- In addition, Eldene Pre-School & Toddlers will ensure that:
  - There is someone with specific responsibility for data protection in the organization: Our Data Controller is **Jessica Wallace**.
  - Everyone managing and handling personal information understands that they are contractually responsible for following good data protection practice.
  - Everyone managing and handling personal information is appropriately trained to do so.
  - Everyone managing and handling personal information is appropriately supervised.
  - Anybody wanting to make enquiries about handling personal information knows what to do.
  - Queries about handling personal information are promptly and courteously dealt with.
  - Methods of handling personal information are clearly described
  - A regular review and audit is made of the way personal information is managed.
  - Methods of handling personal information are regularly assessed and evaluated.
  - Performance with handling personal information is regularly assessed and evaluated.

## **Procedure**

- This procedure enhances the Data Protection and Security Policy, detailing how the policy works within Eldene Pre-School & Toddlers.

This procedure covers Technical, Organisational and Physical Security Measures.

Detection and investigation breach of security include the following:

## **Technical**

Eldene Pre-School & Toddlers uses data stored on:

- a password protected computer
- visual images on a digital camera
- Eldene Pre-School & Toddlers website
- Paper

o Letters

o Forms

o Notes for the Record

These components are stored in a locked filing cabinet in a locked office within the pre-school in the community centre. The computer, camera and paper data (except children's development folders) can only be transported by staff and committee members with the permission of the Manager or Deputy and signed for on the Risk Assessments. If the children's development folders are taken home by the Key Workers. The people removing data or items undertakes to keep the data or items in a secure and confidential environment, whilst it is in their care.

Organisational

Eldene Pre-School & Toddlers has a Confidentiality Policy which all staff, committee members and parents are made aware of.

Risk Assessments are carried out on a daily, termly and ad-hoc basis and signed off by the person most equipped to do so.

Eldene Pre-School & Toddlers uses the following reports on a daily/termly basis: • Accident Book • Incident Book and Forms • Changing Record • Fire Drill Book • Observational Sheets • Activity Plans • Planning Sheets • General letters to parents e.g. newsletters

These books and forms are kept in the office cupboard and are locked away at the end of each session. All materials are archived for the appropriate legally required timings.

Staff and committee personnel files are kept locked in the cupboard within the locked Community Centre. Personnel files contain details of address, medical information, training and DBS Numbers.

## **Technical**

Detection:

- Technical data 'lost' or 'moved'
- Follow chain of command to inform

Investigate:

- Change passwords
- Check records as to who had access
- Interview
- Remove risk of it happening again
- Start disciplinary procedure

**Organisational**

Detection:

- System/process/procedure fails to work
- Follow chain of command to inform

Investigate:

- Check Risk Assessments
- Check evidence
- Interview
- Let relevant staff/committee know of outcome and changes to procedures or policies etc

Physical

- Detection:
- Physical misuse or break
- Follow chain of command to inform

Investigate: • Call relevant authorities (school, police)

Chain of Command to Report

Person finding breach

Deputy

Manager

Committee Chair

Ofsted

External Agency E.g. Police / School

By involving Ofsted and external agencies (depending upon the type of breach), the Manager and Committee Chair will both be involved at the investigative stage.

## **Holders of Keys**

### **Community Centre**

- Preschool Manager – Nicola Timbrell and Jessica Wallace

### **Pre-School Office**

- Room Leaders – Kiah Heard & Jessica Wallace
- Accounts Manager – Julie Miller

### **Locked Office Cupboard**

- Preschool Manager – Nicola Timbrell
- Room Leaders – Kiah Heard & Jessica Wallace

### **Outside Sheds**

- All pre-school staff

Policies linked to Data Protection and Security Policy:

- Child Protection
- Confidentiality
- Employment
- Student Placement
- SEN
- Behaviour
- Health and Safety
- Food and Drink

National Standards linked to Data Protection and Security Policy

1 Suitable Person

- DBS Checks
- Qualifications Information
- Personal data

2 Organisation

- Keyworker Records e.g. observations
- Registration Forms
- Registers

### 3 Physical Environment

- Sole/shared use of premises
- Where and how telephone numbers kept

### 4 Safety

- Risk Assessment
- Fire Drills
- Insurance Certificates
- Visitors Book

### 5 Health

- Medication Book
- Allergy Lists
- First Aid
- Accident Book

### 6 Food and Drink

- Allergy lists

### 7 SEN

- SEN Records (current and achieved)

### 8 Behaviour

- Incident Book

### 9 Working with Parents

- Information about child e.g. Registration Form
- Confidentiality and disclosure
- Parental access to records
- Child to known adult

## 10 Child Protection

- Information

## 11 Documentation

- Confidential verses availability

This policy was adopted at Eldene Pre-School & Toddlers

Meeting held: 8<sup>th</sup> July 2019

Date reviewed: October 2023

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*A. Hanrahan*

Anne Marie Hanrahan - Chairperson